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July 29, 2016

Priscilla Martinez-Velez
Division of Transportation Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Re: **Comments on Draft 2016 Regional Transportation Plan Guidelines**

Dear Ms. Martinez-Velez:

Thank you for the opportunity to comment on the draft 2016 Regional Transportation Plan (RTP) Guidelines. As the Metropolitan Planning Organization and Regional Transportation Planning Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) is interested in providing feedback on the draft RTP Guidelines and the potential implications for our agency.

Following are SBCAG's comments in response to the draft RTP Guidelines released on July 6, 2016.

1. Explicitly state that MPOs that are also RTPAs need only follow the MPO version of the RTP Guidelines:

SBCAG is unique that it is one of a handful of California Metropolitan Planning Organizations (MPOs) that also serves as a Regional Transportation Planning Agency (RTPA). One of the primary changes proposed with this revision of the RTP Guidelines is splitting the document into two separate documents, one each for MPOs and RTPAs. SBCAG previously sought clarification on how this change would impact our organization. According to CTC staff, MPOs also serving as RTPAs would need only follow the MPO version of the RTP Guidelines. SBCAG requests that applicability of the Guidelines be explicitly stated in both versions of the RTP Guidelines. This clarification is important because having to refer to and follow two, separate sets of Guidelines would be unduly burdensome for MPOs that are also RTPAs.

2. Distinguish clearly between statutory requirements and best practices:

The RTP Guidelines should clearly distinguish between contents required by statute/regulation and those that are merely recommendations or best practices. The RTP checklist in Appendix C should be re-organized into separate lists of legal requirements ("shalls") and recommendations/best practices. Legal requirements should include a reference to applicable statute or regulatory authority. SBCAG thinks that the word "should" in the text is too strong for optional or "best practice" items, because it implies an obligation or requirement. If something is not a legal requirement, it should be described as "recommended," "may include" or "might consider including," rather than "should."

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3. Clarify the date when the revised guidelines will become applicable:

A paragraph was added to page 9 of the draft RTP Guidelines to state when the updated RTP Guidelines will become applicable. As drafted, the paragraph is ambiguous and confusing and does not satisfy its intended purpose. We suggest revising the paragraph to state simply, for example, "All RTPs adopted after December 31, 2017 are subject to the updated RTP Guidelines."

4. Limit the inclusion of SB 743-related requirements:

Incorporating elements of SB 743 has been noted as one of the bigger changes in the draft RTP Guidelines. The SB 743 Guidelines are not final yet. Any SB 743-related requirements for MPOs in the RTP Guidelines should only be included where expressly required by the SB 743 statute and the statutory reference should be given, such as the identification of high-quality transit corridors (Gov. Code 65088.1(e)). While MPOs may be required to apply new SB 743 CEQA standards to projects for which they are the lead agency, SB 743 does not give MPOs broader responsibility for SB 743 implementation through the RTP development process.

5. Simplify the discussion on modeling:

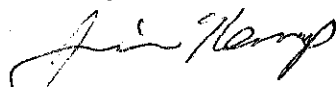
Section 3.4, RTDM Quality Control and Consistency, goes into significantly more depth than is needed for RTP Guidelines. Many aspects of the section are not relevant to developing RTPs. Others, such as the discussion on validating models, should be left to the referenced material. Section 3.4, up to Calculating VMT, could be replaced with a statement such as:

Models used for analysis performed in support of developing an RTP or SCS shall be validated and calibrated in accordance with the latest FHWA guidance. MPOs should consult with Air Resources Board staff early in the SCS development process and on a continuing basis.

SBCAG suggests these changes because we would like the most flexibility possible to account for regional differences and be able to develop plans that fit the unique characteristics of our region. The RTP Guidelines should be limited to stating legal requirements and recommended best practices. MPOs have talented planning staffs that can work with regional stakeholders to develop excellent RTPs without excessive guidance.

Thank you again for the opportunity to comment. Please do not hesitate to contact Peter Imhof of my staff at 805-961-8910 or pimhof@sbcag.org with any questions.

Sincerely,



Jim Kemp
Executive Director

cc: Garth Hopkins, California Transportation Commission
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